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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

-vs-

JEREMY FRANCOM,
Defendant.

Case No. 2:22-CR-00018-APG-VCF

**UNOPPOSED MOTION TO
CONDUCT A PRE-PLEA
PRESENTENCE INVESTIGATION
REPORT & PROPOSED ORDER**

COMES NOW, JEREMY FRANCOM, by and through his attorney of record, JACK E. BUCHANAN, ESQ., and hereby moves this Honorable Court to order the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report of JEREMY FRANCOM as soon as possible.

This request is based upon the pleadings and papers on file herein, the attached Memorandum of Points and Authorities, and any oral argument the Court may entertain.

DATED this 25th day of May, 2022.

/s/ Jack Buchanan
JACK E. BUCHANAN, ESQ.
300 S. Maryland Parkway
Las Vegas, NV 89101
Attorney for Defendant, FRANCOM

I. STATEMENT OF FACTS

II. LEGAL ARGUMENT

Counsel has spoken to the Government and they do not oppose the instant motion.

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1 Therefore, undersigned counsel respectfully requests this Court issue an Order directing the
2 United States Department of Parole & Probation to conduct a pre-plea presentence investigation report
3 of Mr. Francom as soon as possible.

4 **III. CONCLUSION**

5 Based on the foregoing, Defendant asks this Court to grant his Motion to Conduct a Pre-Plea
6 Presentence Investigation Report. Defendant further requests this Court order the United States
7 Department of Parole & Probation to conduct a pre-plea presentence investigation report of Mr.
8 Francom as soon as possible.
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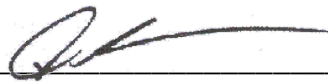
10 Dated this 25th day of May, 2022.

11
12 /s/ Jack Buchanan
13 JACK E. BUCHANAN, ESQ.
14 300 S. Maryland Parkway
15 Las Vegas, NV 89101
16 Attorney for Defendant, FRANCOM

17
18 **ORDER**

19 IT IS ORDERED that the United States Department of Parole and Probation will
20 prepare a Pre-Plea Presentence Investigation Report on Defendant, JEREMY FRANCOM
21 within 90 days.

22 IT IS SO ORDERED

23
24 
25 THE HONORABLE ANDREW P. GORDON
26 UNITED STATES DISTRICT COURT JUDGE

27 DATED: May 26, 2022
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